RE: Comments Kachess Drought Relief Pumping Plant and Keechelus Lake-to-Kachess Lake Conveyance, DRAFT Environmental Impact Statement

Dear Ms. McKinley:

Per my previous letter, dated February 28, 2015, providing comments to the previous open comment period, I am submitting this letter with additional comments.

In my previously letter, I stated the following concern, in reference to the risk to firefighting and the community’s public water system.

Section 3.5.2.1 acknowledges the many wells within 2 miles of Lake Kachess, however, it fails to recognize the Public Group “A” Water System, located several hundred feet from the lake shoreline. This water system provides water to 162 homes in our community, to our fire hydrants, for use in firefighting of structures and wildfire within the boundaries of Kittitas County Fire District #8, and for firefighting via tanker and transport apparatus in contiguous districts where mutual aid and collaborative agreements exist. It fails to describe or quantify the potential effect, dropping the lake level an additional 80+ feet below its natural lowest level, will have on our Public water system or the wells in the area, or on the ability to conduct effect fire suppression activities.

We know that when the level of the lake drops to its lowest possible level in drought years, the input water to our system decreases, but neither we nor you have any idea what would happen if the level was dropped an additional 80+ feet and remained below the full level for many years after a drought, as the DEIS projects it will do. As part of the DEIS, you must determine and quantify the effect the lake level drop will have on our Public water system and provide a mitigation plan to protect our water source.

We have senior water rights dating back to pre-May 10, 1905. As such, if this project proceeds without a full study and satisfactory mitigation, we will be forced to seek
injunctive relief to stop the project and protect our water rights and the water supply to the Kachess Community.

On April 4, 2015, the Kittitas County Commissioners held an open public meeting, which was attended by several members of the Yakima River Basin Water Enhancement Project (YRBWEP) working committee. At that meeting, I again expressed my concern and threat of the diminished water supply to the Kachess Community Association’s public water system and requested that this threat be properly examined and understood. The Kittitas County Commissioner and the working group members stated that they would take steps to better understand issues facing our public water system as well as the other private wells in the area.

As of the writing of this letter, no one has contacted me to understand our water system or the possible effects of this proposal on our water source for the community water system.

Also, as previously stated, Lake Kachess provides a vital source of water needed to fight fires in our community. The fire insurance policies of all members in the Kachess Community Association are based on an independent fire rating. The Washington Surveying and Rating Bureau is in the process of reexamining the firefighting capability in our community and updating it’s rating of our community. As part of the evaluation and rating process, we include access to the water in Lake Kachess as the secondary source of water for firefighting purposes.

If the level of the lake is below the maximum drop of 65 vertical feet possible today, the water would no longer be accessible for firefighting purposes and would substantially affect our firefighting ability and lower the fire rating of our community. This would have a direct negative impact on the cost of fire insurance policies that our community members have to pay to insure their property as well as the property values in our community.

This proposal needs to include a viable method for the Kittitas County Fire District #8 to access water from the lake when it drops below the 65 vertical foot level to include a pipeline and pumping capability that would provide a flow of at least 750 gallons per minutes with an end-point pressure of at least 70psi to maintain a secondary source of water for firefighting purposes.

Although the BOR and Ecology extended the comment period for the DEIS they did not supplement it in anyway. Despite this the BOR stated the following in their website:

The new comment period will end June 15, 2015. A Final EIS will be prepared after all comments have been addressed. Then, a decision will be made regarding which alternative will be selected. Before any project can be implemented, Congress would still need to provide authorization and funding.
WE HEARD YOUR CONCERNS!

Groundwater – You told us you are concerned that additional drawdowns could affect your wells. Water levels at Kachess already undergo annual fluctuation without any known impacts to existing wells or aquifers. During drought years, the proposed pumping plant would draw the reservoir down further. Reclamation and Ecology are reexamining any potential impacts of the drawdown on wells.

Property Values – Many of you expressed concern over potential decline in long-term property values resulting from the operational changes at Kachess Reservoir. Reclamation and Ecology are reevaluating potential impacts on property.

Once again, the BOR and Ecology have ignored the concerns of the public directly affected by this proposal and failed to respond to the commitments made to the public to mitigate the negative impact of this plan.

As President of the Kachess Community Association, I formally request, on behalf of our members, that you rewrite the Kachess Drought Relief Pumping Plant and Keechelus Lake-to-Kachess Lake Conveyance plan and address, to the satisfaction of our members, all of the points outlined in my previous letter, dated February 28, 2015, as well as the specific points outlined in this letter.

Sincerely,

Robert Angrisano
President, Kachess Community Association
PO Box 1089
Fall City, WA 98024